

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

K.04
7/20/89

128435

DATE: 20 JUL 1989

SUBJECT: ACTION MEMORANDUM - Request for a Twelve Month Exemption for the Summit National Liquid Services Site, Deerfield, Ohio (Site Spill ID #04)

FROM: Jose' G. Cisneros, On-Scene Coordinator *J. G. Cisneros*
Emergency and Enforcement Response Branch

TO: Basil G. Constantelos, Director
Waste Management Division

THRU: Mary A. Gade, Associate Division Director *mg*
Office of Superfund

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PURPOSE

SUPERFUND PROGRAM
MANAGEMENT BRANCH

As of June 14, 1989, due to renewed emergency conditions at the Summit National Liquid Services site, time in excess of the designated 12 month limitation was required to remediate the site. The original response action was initiated on March 27, 1987. A waiver of the 12 month limit is required to complete the necessary emergency site actions. Overflow of an on-site retention pond requires immediate heightening of the pond embankment to prevent migration of contaminated site sediments off-site and onto nearby residential properties, and any other necessary stabilization activities. Contaminated soils is one of the problems which contributed to the placement of the site on the National Priorities List, and any activities designed to control soil contamination are fully consistent with remedial site activities. This is a time-critical removal.

Summit National Liquid Services is on the National Priorities List.

BACKGROUND

Incident/Response History

See the original action memo, dated March 27, 1987, (attached) for a site description, history of the site and ownership history. Current site status is unchanged since the completion of the work outlined in the previous action memo. The current threat at the Summit National site is an overflowing lagoon releasing contaminated water and sediment onto the site and nearby residential properties.

On June 14, 1989, after several days of continuous rainfall, residents living adjacent to the Summit National site contacted the Ohio Environmental Protection Agency to report water overflowing the on-site east retention pond and leaving the site to enter their properties. Previous sampling of surface water and sediments from this pond had revealed low levels of volatile and semi-volatile organics, predominantly highest in the sediments. The state of Ohio contacted the U.S. EPA's Emergency and Enforcement Response Branch and requested assistance in halting the off-site migration of pond water and the associated sediments.

The original Emergency Response action was approved on March 27, 1987, by Robert Springer, Acting Regional Administrator. Actions performed under the original memo included:

- 1) Restoring the integrity of pond berm,
- 2) Rerouting site waters to central drainage areas, and
- 3) Recovering and disposing of underground tank contents, including removal of the tank.

All of the above actions were addressed in the removal started in March 1987. But unusually heavy rainfall in June 1989 rendered the current retention pond conditions ineffective in containing the large volume of rainwater that accumulated on site. The possibility of continued rainfall and additional flooding necessitates heightening of the containment berm around the east pond to contain subsequent rainwater. Additional site stabilization and water drainage rerouting may be required to mitigate the threats on site.

The Summit National Liquid Services site is on the National Priorities List with a Hazard Ranking System score of 57.28. The site is currently in the RI/FS phase of remedial action.

THREATS

As described above, extraordinary rainfall levels caused the site retention ponds to exceed their normal holding capacity, resulting in flooding onto off-site properties during the week of June 12, 1989. The threat of continued rainfall which would again cause the overflow of the east pond, was used as justification for renewing site activities on June 14, 1989.

Criteria for Exemption from Statutory Limits

Exemption from the 12-month limit is required to mitigate site conditions as described in CERCLA Section 104 (c), as amended by SARA.

Immediate Risk to Public Health, Welfare, and the Environment

The greatest threat posed by the overflowing water is the possible compromising of the pond wall's structural integrity, resulting in the migration of contaminated sediments downstream, onto private property and residential homes. Analytical results of site sediments and surface waters indicate the presence of low level volatile and semi-volatile organic constituents. Continued exposure to these organic constituents, if they reach nearby residential properties, could lead to increased cancer risk for the residents. The health risks to the environment outside the site boundaries are unknown but could involve stressed flora and fauna, and possible contamination of sensitive wetland habitat.

Continued Response Actions Immediately Required to Mitigate an Emergency

Additional site remediation is required beyond the 12-month limit to mitigate an emergency caused by excessive rainfall in a limited time period, resulting in flooding across the site and off site migration of contaminants. Action to stop the current flooding of the east pond and any future flooding as a result of additional rainfall during the week of June 12, 1989, must begin by June 14, 1989, and is expected to be completed by June 17, 1989. Failure to build up the eastern bank of the east retention pond will result in continued overflowing of water and possibly sediment from the pond and continued deterioration of the existing embankment.

Assistance Will Not Otherwise be Provided in a Timely Manner

Due to the immediacy of the emergency, and the unknown extent of actions necessary to mitigate the threat, the State of Ohio and local officials requested the assistance of the U.S. EPA. The availability of the U.S. EPA to provide funding from the original removal action and the proximity of support personnel out of Cleveland, Ohio, emphasizes the suitability of the U.S. EPA to take the lead on the action.

PROPOSED ACTIONS

In order to protect human health, welfare, and the environment, it is necessary that action be taken to control the sources of off-site release and threatened release of soils, sediments, and surface water. The following immediate removal actions are proposed for the site:

- 1) Install embankments around the perimeter of the east retention pond to eliminate overflow and off-site migration of potentially contaminated sediments and surface water;
- 2) Halt direct flow of surface water from the west retention pond into the east pond;
- 3) Insure operation of present drainage in the state-sanctioned east and south run-off channels; and
- 4) Stabilize the site as necessary.

The project is expected to be completed within four working days. These actions will not only protect nearby residents but will also retain contaminants on site, minimizing the contaminated land area to be addressed by the long-term remedial action.

ENFORCEMENT

See confidential enforcement information in Attachment I.

RECOMMENDATION

Because conditions at the site meet the CERCLA 104 (c) criteria as explained above, I recommend that you approve an exemption from the twelve-month limit to allow continued removal at the Summit National Liquid Services site, Deerfield, Ohio.

Attachment

APPROVAL:

David S. Santenich
DIRECTOR, WASTE MANAGEMENT DIVISION

DATE:

7-26-89

DISAPPROVAL:

DIRECTOR, WASTE MANAGEMENT DIVISION

DATE:

bcc: D. Ouderkirk, OS-210
M. Elam/T. Kenney, 5CS-TUB-3
A. Baumann, 5HS-10
R. Powers/R. Buckley, 5HS-GI
R. Bowden, 5HS-11
P. Schafer, 5HS-11
R. Mancos, 5HS-11
L. Fabinski, ATSDR, 5HS-10
O. Warnsley, RP/CRU, 5HS-12
T. Lesser, 5PA-14
J. Cisneros, 5HS-11